

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

KIM JOHNSON-HOWARD
13724 Neil Armstrong Avenue, #507
Herndon, VA 20171

Case No.:

Plaintiff,

v.

AECOM SPECIAL MISSIONS SERVICES, INC.
20501 Seneca Meadows Parkway, Ste. 300
Germantown, MD 20876

Serve: The Corporation Trust, Inc.
2405 York Road
Suite 201
Lutherville Timonium, MD 21093

and

AECOM GOVERNMENT SERVICES, INC.
20501 Seneca Meadows Parkway, Ste. 300
Germantown, MD 20876

Serve: The Corporation Trust, Inc.
2405 York Road
Suite 201
Lutherville Timonium, MD 21093

Defendants.

COMPLAINT

Plaintiff Kim Johnson-Howard (hereinafter “Plaintiff”), by and through her undersigned counsel, hereby files this Complaint for negligence against Defendants Aecom Special Missions Services, Inc., (“Defendant Special Missions Services”), and Aecom Government Services, Inc. (“Defendant Government Services”) (collectively “Defendants”). In support thereof, Plaintiff alleges as follows:

LAW OFFICES

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JURISDICTION & VENUE

1. This Court has jurisdiction over these claims pursuant to 28 U.S.C. § 1332 (2016) (diversity), as the Plaintiff resides in the Commonwealth of Virginia, the Defendants reside and do business in the state of Maryland, and the amount in controversy exceeds \$75,000.00.

2. Venue is proper under 28 U.S.C. § 1391 (2016) since all Defendants are residents of the State of Maryland.

PARTIES

3. Plaintiff Kim Johnson-Howard is an adult resident of the Commonwealth of Virginia, residing at the above-captioned address.

4. Upon knowledge, information, and belief, Defendant Special Missions Services is a corporation incorporated under the laws of Pennsylvania with its principal place of business in Germantown, Maryland. At all times relevant herein, Defendant Special Missions Services was a subsidiary of Aecom, a multi-national engineering, design, and facilities firm. Defendant Special Missions Services was the recipient of a multi-million dollar contract with the federal government to provide facilities maintenance, repairs, janitorial, and other services to various federal facilities in the area of Northern Virginia, including the federal building in which the events that lead to Plaintiff's injuries complained of herein transpired.

5. Upon knowledge, information, and belief, Defendant Government Services is a corporation incorporated under the laws of Delaware with its principal place of business in Germantown, Maryland. At all times relevant herein, Defendant Government Services was a subsidiary of Aecom, a multi-national engineering, design, and facilities

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firm. Defendant Government Services was the recipient of a multi-million dollar contract with the federal government to provide facilities maintenance, repairs, janitorial, and other services to various federal facilities in the area of Northern Virginia, including the federal building in which the events that lead to Plaintiff's injuries complained of herein transpired.

FACTS

6. Plaintiffs incorporate by reference all other paragraphs of this Complaint as if fully alleged herein, and further alleges as follows:

7. On or about March 7, 2016, Plaintiff Kim Johnson-Howard was leaving a meeting at a federal building located at 1760 Business Center Drive, Reston, Virginia 20190. As she was walking toward the exit of the building in the lobby, she slipped and fell on the wet concrete/marble floor. She fell backwards onto her back, striking her head, buttocks, right hip, and whole back on the floor, sustaining injuries to her neck, head, back, and right hip, among others.

8. Upon information and belief, the floor had been recently mopped by building maintenance workers who were employees and/or agents of the Defendants. There were no signs in the vicinity where Plaintiff fell indicating that the floors were wet or slippery, and Plaintiff was not warned that the floors were wet or slippery.

9. At all times relevant, Plaintiff was free of any and all contributory negligence.

10. As a direct and proximate result of this incident, Plaintiff sustained severe and permanent personal injuries, including, but not limited to, injuries to her head, brain, neck, back, and right hip. As a result of the injuries complained of herein, Plaintiff has

incurred and may continue to incur substantial medical expenses, lost wages, and other damages. Plaintiff has also suffered and continues to suffer from emotional pain and suffering and mental anguish as a result of the incident and her injuries.

COUNT I
(Negligence – All Defendants)

11. Plaintiffs incorporate by reference all other paragraphs of the Complaint as if fully alleged herein.

12. Defendants owed Plaintiff a duty to inspect and maintain the premises; to warn persons lawfully on the premises, including Plaintiff, of any hazardous conditions on the premises, such as the presence of water, moisture, or cleaning supplies on the lobby floor that could create a hazard to persons traversing the floor; and to perform their duties under the contract with the federal government in a reasonable and prudent manner so as to avoid creating hazards to persons lawfully on the premises, such as Plaintiff.

13. Defendants, through their agents and employees, breached these duties to Plaintiff by:

- a. failing to mop and/or clean the lobby floor in a reasonably prudent manner;
- b. failing to inspect the premises for hazards such as water, moisture or cleaning supplies on the lobby floor(s) that could create a hazard;
- c. failing to rectify the hazard created by water on the lobby floor;
- d. failing to ensure that the floor was reasonably dry and safe for persons lawfully on the premises;

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- e. failing to warn Plaintiff and others lawfully on the premises of the hazards created by the wet and slipper floor; and
- f. failing to otherwise act as a reasonable person would under the circumstances.

14. As a direct and proximate result of the negligence of Defendants, Plaintiff sustained personal injuries; has incurred, and may continue to incur, substantial expenses for medical care and attention; has incurred and will continue to incur lost wages; has suffered and will continue to suffer from substantial injury that has significantly affected her ability to perform her customary daily activities; and has suffered, and will continue to suffer from physical pain and mental anguish.

15. All of Plaintiff's aforementioned injuries were and are due solely to the negligence of Defendant, without any negligence or lack of due care on the part of the Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Kim Johnson-Howard, demands judgment against the Defendants Aecom Special Missions Services, Inc. and Aecom Government Services, Inc., jointly and severally, in the amount Three Million Dollars and 00/100 (\$3,000,000.00), plus costs, interest and any other relief that the Court deems just and proper.

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Respectfully submitted,

KOONZ, MCKENNEY, JOHNSON,
DEPAOLIS & LIGHTFOOT, L.L.P.

/s/ Kasey K. Murray

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Attorney for the Plaintiff

JURY DEMAND

Plaintiff respectfully requests a jury trial as to all issues alleged herein.

/s/ Kasey K. Murray

Kasey K. Murray

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